

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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IN RE: : No.: 14-MD-2543 (JMF)  
: :  
GENERAL MOTORS LLC IGNITION :  
SWITCH LITIGATION :  
: :  
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This Document Relates To : No.: 14-CV-5810 (JMF)  
: :  
LAWRENCE JOSEPH BARTHELEMY AND :  
DIONNE MARIE SPAIN :  
: :  
Plaintiffs, :  
: :  
v. :  
: :  
GENERAL MOTORS, LLC :  
: :  
Defendants :  
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**PLAINTIFFS' MOTION *IN LIMINE* NO. 1**

**PLAINTIFFS' MOTION *IN LIMINE* TO EXCLUDE EVIDENCE AND/OR ARGUMENT  
REGARDING MR. BARTHELEMY'S CRIMINAL RECORD AND PRIOR ARRESTS**

**TO BE FILED UNDER SEAL**

Pursuant to Federal Rules of Evidence 401–404 and 608–609 and for the reasons set forth in the accompanying memorandum of law, Plaintiffs move to exclude at trial evidence or argument regarding Barthelemy's criminal record and prior arrest.

Dated: February 2, 2016

Respectfully Submitted,

\_\_\_\_\_  
/s/  
Randall W. Jackson  
BOIES SCHILLER & FLEXNER LLP  
575 Lexington Avenue  
New York, New York 10002  
T. 212-446-2300

**CERTIFICATE OF SERVICE**

I do hereby certify that a true copy of the above document was served upon the attorney of record for each other party by e-mail on February 2, 2016.

\_\_\_\_\_  
/s/  
Randall W. Jackson  
Boies, Schiller & Flexner LLP  
*Counsel for Plaintiffs*